

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020 (MG)

(Jointly Administered)

**NOTICE OF INTENT TO PARTICIPATE IN
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that Rowena Drennen, Flora Gaskin, Roger Turner, Christie Turner, John Picard, and Rebecca Picard (“**Kessler Class Claimants**”), a representative group of lead plaintiffs of the class (known and referred to in these cases as the “**Kessler Class**”) in the consolidated class action entitled In re: Community Bank of Northern Virginia Second Mortgage Lending Practice Litigation, represented by Polsinelli PC, Walters, Bender, Strohhahn & Vaughan, and Carlson Lynch LTD, have filed Claim Number 2110 against Residential Funding Company, LLC; Claim Number 2117 against Residential Capital, LLC; Claim Number 2254 against GMAC-RFC Holding Company, LLC; and Claim Number 5596 against GMAC Mortgage, LLC in the amount, on average, of \$42,076.00 for each individual member of the Kessler Class, and/or is a party of interest in the confirmation of a plan in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) on the basis that: Rowena Drennen is a member of the Official Committee of Unsecured Creditors (subject to final Court approval in connection with the Plan confirmation process); the Kessler Class Claimants are parties to a Settlement Agreement with the Debtors; the Kessler Class Claimants are a party to the Plan Support Agreement; and the Kessler Class has a special interest in the Borrower Claims True-Up that is a central feature of the Plan and other financial and legal matters relating to the Plan.

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the above-named parties-in-interest and their counsel intends to participate as

follows in Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on September 9, 2013 [Docket No. 4794].

Dated: September 16, 2013

POLSINELLI

By: /s/ Daniel J. Flanigan
DANIEL J. FLANIGAN
900 Third Avenue, Suite 2100
New York, New York 10022
(212) 684-0199
Fax No. (212) 759-8290
dflanigan@polsinelli.com

BANKRUPTCY COUNSEL
FOR CLASS CLAIMANTS

Contact Information for Party-in-Interest (address, phone and email):

Rowena Drennen, et al.
c/o Attorneys listed below

Contact Information for Attorneys for Party-in-Interest (address, phone and email):

Daniel J. Flanigan, Esq.
POLSINELLI
900 Third Avenue, Suite 2100
New York, New York 10022
(212) 684-0199
dflanigan@polsinelli.com

R. Bruce Carlson, Esq.
CARLSON LYNCH LTD
115 Federal Street, Suite 210
Pittsburgh, Pennsylvania 15212
(412) 322-9243
bcarlson@carlsonlynch.com

David M. Skeens, Esq.
WALTERS, BENDER, STROHBEHN & VAUGHN
2500 City Center Square
1100 Main
Kansas City, Missouri 64105
(816) 421-6620
dskeens@wbsvlaw.com

R. Frederick Walters, Esq.
WALTERS, BENDER, STROHBEHN & VAUGHN
2500 City Center Square
1100 Main
Kansas City, Missouri 64105
(816) 421-6620
fwalters@wbsvlaw.com

Contact Information for Advisors for Party-in-Interest (address, phone and email):

N/A

Designation of Contact(s) to Receive Any Notice(s) Required Under the Order (address, phone and email):
(Same as Attorneys)

Group that Participant elects to join (pursuant to Paragraph 3(b) of the Order):

N/A
